HANG & ASSOCIATES, PLLC

ATTORNEYS AT LAW

136-20 38th Avenue, Suite 10G Flushing, New York 11354 APPLICATION GRANTED

June 8, 2022

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John G. Koeltl, U.S.D.J.

VIA ECF

Hon. John G. Koeltl United States District Court Southern District of New York 40 Foley Square New York, NY 10007

АРРЫСАТЮИ БЯРИТЕР ВО ОЯРЭЙНО ОВ

Re:

Zhang et al v. Great Sichuan On 3rd Ave., Inc. et al

Case No. 1:15-cv-04558-JGK-JW

Letter Motion for Extension of Time to file proposed Order to Show Cause

Dear Judge Koeltl:

This office represents Plaintiff Jian Xin Zhang, Hua Long Yang, Rui Sen Zhao, Cheng Min Yan, Jian Qiang Du, Yu Bao Zhao, and Guo Yue He in the above-referenced matter. We request a 14-day extension of time to file the Proposed Order to Show Cause through June 17, 2022.

This is the second time for Plaintiff Jian Xin Zhang, Hua Long Yang, Rui Sen Zhao, Cheng Min Yan, Jian Qiang Du, Yu Bao Zhao, and Guo Yue He to request an extension of time to file a Proposed Order to Show Cause. The due date was June 3, 2022, pursuant to the Order dated June 2, 2022. (Dkt. No. 158).

The impetus for this request is that the Proposed Clerk's Certificates of Default are still under the review of the clerk, it is impractical to move by Order to Show Cause without the Clerk's Certificates of Default. In addition, the Plaintiffs' lead attorney Mr.

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Shan Zhu left the firm this week, the new attorney needs more time to familiarize the case. Based on the above reasons, we respectfully request that the Court grant the instant application and we sincerely apologize for this late submission

We thank the Court for its time and attention to this matter.

Respectfully Submitted,

Hang & Associates, PLLC
By: s/ Zhangyuxi Wang
Zhangyuxi Wang, Esq.
Attorneys for Plaintiffs